

**Exhibit 25: Complaint, Ross Collette v.  
Alternative Fuel Technologies, Inc., Macomb  
County Case No. 16-3803-CR**

STATE OF MICHIGAN  
IN THE 16TH JUDICIAL CIRCUIT COURT  
MACOMB COUNTY

ROSS COLLETTE, )  
 )  
 PLAINTIFF, )  
 )  
 )  
 vs. )  
 )  
 ALTERNATIVE FUEL )  
 TECHNOLOGIES, INC., )  
 a Corporation, and )  
 DOES 1-20 Inclusive, )  
 )  
 DEFENDANTS. )

COMPLAINT  
16-CR

CASE NO:  
HON: 16 - 3803 - C R

**JOSEPH TOIA**

FILED  
16 OCT 28 PM 3:17

CHRISTELA SABAU  
MACOMB COUNTY CLERK  
MT. CLEMENS, MICHIGAN

BREACH OF FIDUCIARY DUTY  
COMPLAINT TO APPOINT A CORPORATE RECEIVER

There is no other pending or resolved civil action arising out of the transaction of occurrence alleged in the Complaint.

To: Said Honorable Court

The petition of Ross Collette, Plaintiff Pro Se, complaining of Alternative Fuel Technologies, Inc. ("the Corporation") alleges upon personal knowledge as to his own acts and upon information and belief as to all other matters as follows:

Jurisdiction and Venue

1. This Honorable Court has jurisdiction over this action pursuant to MCL 450.1487 and MCR 2.622.
2. Venue is proper in Macomb County pursuant to MCL 600.1621(b).

**Nature of the Action**

3. As further enumerated below, Plaintiff brings this action (1) for breach of fiduciary duties of care, loyalty and good faith to the Corporation's shareholders; and, (2) for the appointment of a corporate receiver. The officers and directors of Defendant Corporation have abandoned it and its assets are being wasted, causing injury to the corporation.
4. Plaintiff asks this Honorable Court to appoint Tara Harvey as receiver of the corporation to manage the business and affairs of the corporation, with full and exclusive power, duty, and authority to: marshal and safeguard any and all of its assets, to establish a claims period for the filing of any claims of creditors and any other duties the Court deems appropriate. Plaintiff nominates Tara Harvey who is well-suited to handle this matter, and attaches her credentials as Exhibit A to this Complaint.
5. Tara Harvey over 20 years of experience comprised of criminal matters, corporate matters, and the capability and corporate exposure necessary for carrying out the tasks that will be required as a custodian.

**Parties**

6. Defendant's principal place of business and last known address is:

112237 Woodbine  
Redford, Michigan 48239

7. Defendant Alternative Fuel Technologies is a Nevada Corporation, publicly traded under the ticker symbol "AFTC".

8. Plaintiff resides in Roseville, Macomb County, Michigan.
9. Defendant DOES 1-20 inclusive are individuals, corporations, partnerships or unincorporated associations who may or may not have an interest in the outcome of this matter, but who are unknown to Plaintiff and are therefore being sued under fictitious names until such time as their identities and interests are discovered.

### Allegations

10. On or about November 30, 2015 the Corporation's status became revoked.
11. The Corporation has not met any of its filing obligations and has failed to comply with any and all statutory requirements.
12. Plaintiff has made numerous attempts to contact the officers and directors of the Corporation and has demanded that the Corporation comply with statutory requirements and Defendant has failed to in any way respond.
13. No one has filed anything, on behalf of the Corporation, with the State of Nevada since December 21, 2014. No one has filed anything with the State of Michigan to do business in this state.
14. No one from this Corporation can be located, including officers, agents or representatives.
15. Over-the-counter trading markets have no information about the current status or whereabouts of persons responsible for the management of the Corporation.
16. The current directors of the Corporation have abandoned the company in that they have failed to pay state fees, hold annual meetings, maintain an office and/or a telephone number.
17. The Corporation has abandoned its business and has failed within a reasonable time to take steps to dissolve, liquidate or distribute its assets.
18. The Corporation has assets that are being misapplied or wasted causing a material injury to the Corporation and its shareholders.

19. The appointment of a receiver will remedy the allegations of Plaintiff.
20. Tara Harvey is an impartial person and attaches her statement of disinterestedness as Exhibit B to this Complaint.

#### **PRAYER FOR RELIEF**

WHEREFORE, Plaintiff prays this Honorable Court for judgment and relief in the best interests of the Corporation as follows:

- A. Appoint Tara Harvey receiver of the Corporation without bond; and
- B. Grant the receiver power and authority to exercise all of the powers of the Corporation, through or in place of its board of directors or officers to the extent necessary to manage the affairs of the Corporation in the best interests of its shareholders and creditors; and
- C. Award Plaintiff costs for bringing this action; and,
- D. Any and all equitable relief as the Court deems just.

Respectfully submitted,



---

Ross Collette  
Plaintiff Pro Se  
28329 Utica Road  
Roseville, MI 48066  
(586) 907-1936

Dated: 10-3-16

**Tara Harvey**(302) 943-8179  
tara.harveylegal@gmail.com**Skills Summary**

Professionally trained by the United States Air Force with more than eighteen years of experience as a paralegal. Extremely proficient in performing research and compiling data for organized report presentation. Experienced in time-sensitive, fast-paced, and demanding work environments. Willing to work all hours to see tasks achieved through to completion.

**Core Professional Strengths**

Attorney Assistance	Problem Solving	Personnel Management
Client Service	Reliability	Office Equipment Maintenance
Research	Organization	Computer Operation
Writing/Drafting Documents	General Accounting	Office Equipment Operation

**Software Proficiencies**

Microsoft Word, Excel, Publisher, Outlook, PowerPoint, Access and numerous databases

**Experience**

Division of Substance Abuse and Mental Health – State of Delaware (April 2012 – May 2015)

- *Paralegal III – Treatment Access Center*
  - Case Manager (CM) Support – Develop streamlined process for caseload management. Audit caseloads for CMs to ensure equality in distribution of cases.
- *Paralegal III – Delaware Psychiatric Center*
  - Legal Status Coordinator – Ensure protection of client civil rights. Attend and document numerous types of court hearings. Provided USDOJ with required information.
  - Staff Due Process and Court Procedures subcommittee in order to change DE Mental Health laws through HJR17 Committee.

United States Air Force (October 1997 – July 2008)

- *Legal Office Paralegal – Office of the Staff Judge Advocate*
  - Victim/Witness Assistance Program Representative – Walked victims/witnesses through the legal process. Prepared them for possible/potential case resolutions and testimony.
  - Civil Law – Managed Administrative Discharge Program; prepared documentation and advised commanders on processing requirements. Managed tax center at two bases.
  - Military Justice (Prosecution) Paralegal – In charge of nonjudicial punishment program and court-martial preparation.
- *Defense Paralegal – Air Force Legal Operations Agency*
  - Law Office Superintendent – Performed all tasks associated with court-martial preparation.
  - Client Intake – Interviewed clients and summarized cases for attorneys.
  - Budget Manager – Ensured office was supplied and fully functional.
- *Headquarters Paralegal – 21<sup>st</sup> Air Force*
  - Headquarters quality assurance/legal sufficiency assessor of nonjudicial punishment and court-martial documentation from six AF bases.

**Education**

- Fayetteville Technical Community College, Fayetteville, NC
  - Associate of Arts, General Education (with honors)
  - Associate of Arts, Criminal Justice (with honors)
- Community College of the Air Force
  - Associate of Arts, Paralegal
- Airman Leadership School, F.E. Warren AFB, WY
  - Distinguished Graduate Award
- Grantham University, Kansas City, MO
  - Bachelor of Science, Criminal Justice (Summa Cum Laude)
- Kaplan University – Online – Current GPA – 4.0

"Knowing is not enough; we must apply. Willing is not enough; we must do." ~ Johann Wolfgang von Goethe

Exhibit B

## RECEIVER'S STATEMENT OF DISINTERESTEDNESS PURSUANT TO MCR 2.622(B)(6)

The following statements are true to the best of my knowledge, information and belief (if any statement is untrue, check the box and specify why it is untrue, attaching additional pages as necessary):

1. I have conducted an investigation of whether there is a basis for my disqualification under MCR 2.622(b)(6) prior to submitting this Statement.
2. Except as described below, I am not a creditor or a holder of an equity security of the Receivership Estate.

None

Describe:

---

---

---

3. Except as described below, I have no connections with the Plaintiff(s), principals of the Plaintiff(s), insiders of the Plaintiff(s) or any other party or parties in interest in the captioned case.

None

Describe:

---

---

---

4. Except as described below, I have no connections with the Defendant(s), principals of the Defendant(s), insiders of the Defendant(s) or any other party or parties in interest in the captioned case.

None

Describe:

---

---

---

5. Except as described below, I have no connections with the Plaintiff's/(s') attorneys, the Plaintiff's/(s') professionals or the Defendant's/(s') professionals (i.e. accountants, attorneys, appraisers, financial advisers, brokers).

[  ] None

[  ] Describe:

---

---

6. Except as described below, I am not and have not been an investment banker for any outstanding security of the Receivership Estate.

[  ] None

[  ] Describe:

---

---

7. Except as described below, I am not and have not, within the last three years, been an investment banker for a security of the receivership estate, or an attorney for such an investment banker, in connection with the offer, sale, or issuance of a security of the receivership estate.

[  ] None

[  ] Describe:

---

---

8. Except as described below, I am not and have not, within the last two years, been a director, an officer, or an employee of the receivership estate or of an investment banker that either (a) served as an investment banker in connection with any outstanding security of the receivership estate or (b) was engaged by the receivership estate for a security of the receivership estate within the last three years.

[  ] None

[  ] Describe:

---

9. Except as described below, I do not hold an interest adverse to the interest of any class of creditors or equity security holders by reason of any direct or indirect relationship to, connection with, or interest in the receivership estate or an investment banker that either (a) served as an investment banker in connection with any outstanding security of the receivership estate or (b) was engaged by the receivership estate for a security of the receivership estate within the last three years, or for any other reason.

[] None

[] Describe:

10. Except as described below, I do not hold or represent an interest adverse to the receivership estate or stand in any relation to the subject of the action or proceeding that would tend to interfere with the impartial discharge of my duties as an officer of the court.

[] None

[] Describe:

11. Except as described below, I do not and have not at any time within the last five years, represented or been employed by the receivership estate, any secured creditor of the receivership estate as an attorney, accountant, appraiser, or in any other professional capacity.

[] None

[] Describe:

12. Except as described below, I am not an "insider" as defined by MCL 566:31(g).

[TH] None  
[ ] Describe:

---

---

---

13. Except as described below, I do not represent and I am not employed by a creditor of the receivership estate.

[TH] None  
[ ] Describe:

---

---

---

14. Except as described below, I do not have a relationship to the above captioned action or proceeding that will interfere with the impartial discharge of my duties as receiver.

[TH] None  
[ ] Describe:

---

---

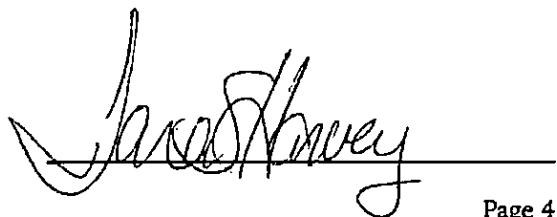
---

Total number of attached pages of supporting documentation: \_\_\_\_\_

After conducting or supervising the investigation described in paragraph 1 above, I declare under penalty of perjury, that the foregoing is true and correct except that I declare that Paragraphs 1 through 14 are stated on information and belief.

I declare under penalty of perjury that the foregoing is true and correct.

DATE: 7/8/16



Page 4 of 5



Tara Harvey, Proposed